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March 10, 2025

**VIA ECF**

Honorable José R. Almonte  
United States District Judge  
District Court of New Jersey  
Frank Lautenberg Post Office & U.S. Courthouse  
2 Federal Square  
Newark, New Jersey 07102

**Re: *Catalyst Pharms. Inc., et al. v. Lupin Ltd., et al.*, C.A. No. 23-1197-MEF-JRA**

Dear Judge Almonte:

This firm, along with Sterne, Kessler, Goldstein & Fox P.L.L.C., represents Plaintiffs Catalyst Pharmaceuticals, Inc. and SERB SA (collectively, "Plaintiffs") in the above-referenced matter. Together with Midlige Richter LLC and Buchanan Ingersoll & Rooney PC, counsel for Defendants Lupin Ltd. and Lupin Pharmaceuticals, Inc. (collectively, "Lupin"), we respectfully submit this joint status letter in anticipation of the upcoming status conference scheduled for March 17, 2025, at 3:30 p.m. ET. *See* ECF No. 209.

The parties are in the midst of the expert discovery phase of this proceeding, and reply expert reports were recently served on March 3, 2025. The deadline to submit sur-reply expert reports on objective indicia is set for April 4, 2025, and expert discovery in this proceeding is scheduled to remain open through June 6, 2025. With respect to claim construction, the parties note that all *Markman*-related briefing is complete, but no hearing has been scheduled.

The parties are currently engaged in a discovery dispute arising out of Lupin's submission of its rebuttal non-infringement report on January 31, 2025. The parties will set forth their positions regarding this dispute in a separate joint discovery dispute letter to be submitted before the scheduled status conference. The parties are also engaged in a related discovery dispute pertaining to the deposition of Lupin's sole remaining fact witness. The parties are prepared to address their respective positions at the upcoming March 17, 2025 status conference should the Court so desire.

The parties thank the Court for its consideration and assistance in this matter.

Respectfully submitted,

s/ Charles H. Chevalier  
Charles H. Chevalier

cc: Counsel of Record (via ECF and e-mail)